

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:) Case No. 3:24-cv-00209
) Judge Aleta A. Trauger
CUMMINGS MANOOKIAN, PLLC,)
) Appeal from:
Debtor.) No. 3:19-bk-07235

**APPELLANT BRIAN MANOOKIAN’S STATEMENT OF THE ISSUES TO BE
PRESENTED AND DESIGNATION OF ITEMS TO BE
INCLUDED IN APPELLATE RECORD**

Pursuant to Federal Rule of Bankruptcy Procedure 8009, Appellant Brian Manookian (“Appellant”) hereby files this Statement of the Issues to be Presented and Designation of Items to be Included in Appellate Record.

Issues To Be Presented

Whether the Bankruptcy Court erred in its Orders (1) finding Appellant lacks standing to object to the Trustee’s Motion for Compromise and Settlement and (2) granting Trustee’s Motion to Approve Compromise and Settlement of a valueless claim. Both Orders were issued on February 8, 2024.

Designation of Items To Be Included in Appellate Record

The appellate record consists of the following:

- ☐ All docket entries in the bankruptcy proceeding (No. 3:19-bk-07235), specifically including the Orders in docket entries 205 and 206, as well as docket entries 108, 112, 123, 124, 125, 131, 135, 136, 144, and 147, and related adversary proceeding (No. 3:20-ap-90002) docket entries 1, 2, 7, 10, 15, 68, 71, and 73, and all attachments thereto;

- ☐ Transcript (forthcoming) of February 7, 2024 hearing in the bankruptcy proceeding (No. 3:19-bk-07235) preceding the above-referenced Orders.
- ☐ Transcript of September 29, 2021 hearing (attached as Exhibit 1).

Date: March 8, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Statement of the Issues to be Presented and Designation of Items to be Included in Appellate Record was filed March 8, 2024, and served electronically upon the following parties in interest as indicated on the receipt issued by the Court's electronic filing system:

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